

Exhibit A

Proposed Order

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*
al.,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to the
Commonwealth.

ORDER GRANTING FOUR HUNDRED EIGHTY-SEVENTH OMNIBUS OBJECTION
(NON-SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO TO CROSS-
DEBTOR DUPLICATE CLAIMS

Upon the *Four Hundred Eighty-Seventh Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico to Cross-Debtor Duplicate Claims* (the “Four Hundred Eighty-Seventh Omnibus Objection”)² filed by the Commonwealth of Puerto Rico (the “Commonwealth” or the “Debtor”), dated August 5, 2022, for entry of an order disallowing in their entirety certain claims filed against the Commonwealth, as more fully set forth in the Four Hundred Eighty-

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Four Hundred Eighty-Seventh Omnibus Objection.

Seventh Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Four Hundred Eighty-Seventh Omnibus Objection and to grant the relief requested therein pursuant to PROMESA Section 306(a); and venue being proper pursuant to PROMESA Section 307(a); and due and proper notice of the Four Hundred Eighty-Seventh Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and each of the claims filed against the Commonwealth identified in the column titled “Claims to Be Disallowed” in Exhibit A to the Four Hundred Eighty-Seventh Omnibus Objection (collectively, the “Claims to Be Disallowed”) being duplicative of claims asserted against ERS, PBA, or HTA, for which the asserted liability would lie, if at all, against ERS, PBA, or HTA; and the Court having determined that the relief sought in Four Hundred Eighty-Seventh Omnibus Objection is in the best interest of the Debtor and its creditors, and all the parties in interest; and the Court having determined that the legal and factual bases set forth in the Four Hundred Eighty-Seventh Omnibus Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the Four Hundred Eighty-Seventh Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Claims to Be Disallowed are hereby disallowed in their entirety; and it is further

ORDERED that the Debtors’ right to object to the Remaining Claims on any grounds whatsoever is reserved; and it is further

ORDERED that this Order resolves Docket Entry No. 21737 in Case No. 17-3283; and it is further

ORDERED that Kroll is authorized and directed to designate as expunged the Claims to Be Disallowed from the official claims register in the Title III Cases; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED

Dated: _____

Honorable Judge Laura Taylor Swain
United States District Judge

EXHIBIT A

Schedule of Claims Subject to the Four Hundred Eighty-Seventh Omnibus Objection

Four Hundred Eighty-Seventh Omnibus Objection

Exhibit A - Claims to Be Disallowed

CLAIMS TO BE DISALLOWEDREMAINING CLAIMS

	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
1	AGUILA GEIRING, VICKIE PO BOX 2 GARROCHALES, PR 00652	06/29/18	17 BK 03283-LTS Commonwealth of Puerto Rico	83123	Undetermined*	AGUILA GEIRING, VICKIE CO NORA MOLINA CRUZ PO BOX 2795 ARECIBO, PR 00613-2795	06/29/18	17 BK 03566-LTS Employees Retirement System of the Government of the Commonwealth of Puerto Rico	70430	Undetermined*
Reason: Duplicate liability filed against Debtor Commonwealth of Puerto Rico.										
Surviving Claim # 70430 is on Omni 337 Claims To Be Reclassified from ERS to Commonwealth										
2	CINTRON DIAZ, IRMA L. JJ172 TOPACIO TERRAZAS DEMAJAGUA FAJARDO, PR 00738	06/29/18	17 BK 03283-LTS Commonwealth of Puerto Rico	137110	Undetermined*	CINTRON DIAZ, IRMA L. JJ172 TOPACIO TERRAZAS DEMAJASUA II FAJARDO, PR 00738	06/29/18	17 BK 03566-LTS Employees Retirement System of the Government of the Commonwealth of Puerto Rico	143774	Undetermined*
Reason: Duplicate liability filed against Debtor Commonwealth of Puerto Rico. All asserted liabilities, if any would be between the Claimant and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico.										
3	COLON CRUZ, JOSE PO BOX 40177 SAN JUAN, PR 00940-0177	05/24/18	17 BK 03567-LTS Puerto Rico Highways and Transportation Authority	32443	\$17,500.00*	COLON CRUZ, JOSE A. PO BOX 40177 SAN JUAN, PR 00940-0177	06/23/18	17 BK 03567-LTS Puerto Rico Highways and Transportation Authority	34877	\$28,000.00*
Reason: Duplicate liability filed against Debtor Commonwealth of Puerto Rico. All asserted liabilities, if any would be between the Claimant and the Puerto Rico Highways and Transportation Authority.										
4	COLON OTERO, MYRNA L #9 URB. RAMOS ANTONINI CIDRA, PR 00739	09/13/21	17 BK 03283-LTS Commonwealth of Puerto Rico	179584	\$75,000.00	COLON OTERO, MYRNA LUZ URB. RAMOS ANTONINI #9 CALLE A CIDRA, PR 00739	09/21/20	17 BK 03566-LTS Employees Retirement System of the Government of the Commonwealth of Puerto Rico	175868	\$75,000.00
Reason: Duplicate liability filed against Debtor Commonwealth of Puerto Rico. All asserted liabilities, if any would be between the Claimant and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico.										

Four Hundred Eighty-Seventh Omnibus Objection

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	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
5	CRUZ CRUZ, ANA R LOS CAOPOS CALLE COJOBA 2833 PONCE, PR 00731	06/19/18	17 BK 03283-LTS Commonwealth of Puerto Rico	72562	Undetermined*	CRUZ CRUZ, ANA R. LOS CAOPOS CALLE COJOBA 2833 PONCE, PR 00731	06/27/18	17 BK 03566-LTS Employees Retirement System of the Government of the Commonwealth of Puerto Rico	106617	Undetermined*
Reason: Duplicate liability filed against Debtor Commonwealth of Puerto Rico. All asserted liabilities, if any would be between the Claimant and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico.										
6	CRUZ CRUZ, ANA R LOS CAOPOS CALLE COJOBA 2833 PONCE, PR 00731	06/27/18	17 BK 03283-LTS Commonwealth of Puerto Rico	106371	Undetermined*	CRUZ CRUZ, ANA R. LOS CAOPOS CALLE COJOBA 2833 PONCE, PR 00731	06/27/18	17 BK 03566-LTS Employees Retirement System of the Government of the Commonwealth of Puerto Rico	106617	Undetermined*
Reason: Duplicate liability filed against Debtor Commonwealth of Puerto Rico. All asserted liabilities, if any would be between the Claimant and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico.										
7	DIAZ QUIRINDONGO, ORLANDO PO BOX 40177 SAN JUAN, PR 00940-0177	06/23/18	17 BK 03567-LTS Puerto Rico Highways and Transportation Authority	71158	\$14,000.00*	DIAZ QUIRINDONGO, ORLANDO PO BOX 40177 SAN JUAN, PR 00940-0177	06/23/18	17 BK 03567-LTS Puerto Rico Highways and Transportation Authority	38449	\$17,500.00*
Reason: Duplicate liability filed against Debtor Commonwealth of Puerto Rico. All asserted liabilities, if any would be between the Claimant and the Puerto Rico Highways and Transportation Authority.										
8	FELICIANO ROSADO, JESUS PERLA DEL SUR 4413 PEDRO CARATINI PONCE, PR 00717	07/05/18	17 BK 03283-LTS Commonwealth of Puerto Rico	98258	Undetermined*	FELICIANO ROSADO, JESUS PERLA DEL SUR 4413 PEDRO CARATINI PONCE, PR 00717	07/05/18	17 BK 03567-LTS Puerto Rico Highways and Transportation Authority	165443	Undetermined*
Reason: Duplicate liability filed against Debtor Commonwealth of Puerto Rico. All asserted liabilities, if any would be between the Claimant and the Puerto Rico Highways and Transportation Authority.										

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	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
9	FLORES MIRANDA, EDWIN PO BOX 40177 SAN JUAN, PR 00940-0177	06/23/18	17 BK 03567-LTS Puerto Rico Highways and Transportation Authority	66027	\$14,000.00*	FLORES MIRANDA, EDWIN PO BOX 40177 SAN JUAN, PR 00940-0177	06/23/18	17 BK 03567-LTS Puerto Rico Highways and Transportation Authority	38432	Undetermined*
Reason: Duplicate liability filed against Debtor Commonwealth of Puerto Rico. All asserted liabilities, if any would be between the Claimant and the Puerto Rico Highways and Transportation Authority.										
10	LOPEZ HERNANDEZ, MONICA HC 1 BOX 6982 MOCA, PR 00676	06/29/18	17 BK 03283-LTS Commonwealth of Puerto Rico	66682	\$4,100.00	LOPEZ HERNANDEZ, MONICA HC 1 BOX 6982 MOCA, PR 00676	06/29/18	17 BK 03566-LTS Employees Retirement System of the Government of the Commonwealth of Puerto Rico	77416	\$25,525.77
Reason: Duplicate liability filed against Debtor Commonwealth of Puerto Rico. All asserted liabilities, if any would be between the Claimant and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico.										
11	MARIANI GUEVARA, VIOLETA P.O. BOX 138 PATILLAS, PR 00723	06/27/18	17 BK 03283-LTS Commonwealth of Puerto Rico	137422	Undetermined*	MARIANI GUEVARA, VIOLETA PO BOX 138 PATILLAS, PR 00723	06/27/18	17 BK 03566-LTS Employees Retirement System of the Government of the Commonwealth of Puerto Rico	80935	Undetermined*
Reason: Duplicate liability filed against Debtor Commonwealth of Puerto Rico. All asserted liabilities, if any would be between the Claimant and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico.										
12	MASSA DIEPPA, HILDA CALLE 8 F1-48 CIUDAD MASSO SAN LORENZO, PR 00754	06/22/18	17 BK 03283-LTS Commonwealth of Puerto Rico	76464	\$75,000.00*	MASSA DIEPPA, HILDA F 1 -48 CALLE 8 CIUDAD MASSO SAN LORENZO, PR 00754	07/13/20	17 BK 03566-LTS Employees Retirement System of the Government of the Commonwealth of Puerto Rico	174126	\$4,897.20
Reason: Duplicate liability filed against Debtor Commonwealth of Puerto Rico. All asserted liabilities, if any would be between the Claimant and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico.										

Four Hundred Eighty-Seventh Omnibus Objection

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CLAIMS TO BE DISALLOWEDREMAINING CLAIMS

NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
13 ORTIZ MIRANDA, MELVYN P.O. BOX 1483 DORADO, PR 00646	06/28/18	17 BK 03283-LTS Commonwealth of Puerto Rico	123442	\$50,000.00*	ORTIZ MIRANDA, MELVYN F. PO BOX 1483 DORADO, PR 00646	06/28/18	17 BK 03566-LTS Employees Retirement System of the Government of the Commonwealth of Puerto Rico	121110	Undetermined*
Reason: Duplicate liability filed against Debtor Commonwealth of Puerto Rico. All asserted liabilities, if any would be between the Claimant and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico.									
14 ORTIZ RUIZ, FLOR MARIA VILLAS SAN AGUSTIN P 17 CALLE 10 BAYAMON, PR 00959	06/27/18	17 BK 03283-LTS Commonwealth of Puerto Rico	56739	\$82,000.00	ORTIZ RUIZ, FLOR MARIA VILLAS SAN AGUSTIN P 17 CALLE 10 BAYAMON, PR 00959	06/25/18	17 BK 03566-LTS Employees Retirement System of the Government of the Commonwealth of Puerto Rico	37792	\$82,000.00
Reason: Duplicate liability filed against Debtor Commonwealth of Puerto Rico. All asserted liabilities, if any would be between the Claimant and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico.									
15 PEREZ GUILLERMETY, IRMA PO BOX 40177 SAN JUAN, PR 00940-0177	05/24/18	17 BK 03567-LTS Puerto Rico Highways and Transportation Authority	47094	\$18,000.00*	PEREZ GUILLERMETY, IRMA PO BOX 40177 SAN JUAN, PR 00940-0177	06/23/18	17 BK 03567-LTS Puerto Rico Highways and Transportation Authority	39520	\$45,000.00*
Reason: Duplicate liability filed against Debtor Commonwealth of Puerto Rico. All asserted liabilities, if any would be between the Claimant and the Puerto Rico Highways and Transportation Authority.									
16 RODRIGUEZ SANTOS, MARILYN HC 01 BOX 2238 LAS MARIAS, PR 00670	06/29/18	17 BK 03283-LTS Commonwealth of Puerto Rico	130294	Undetermined*	RODRIGUEZ SANTOS, MARILYN HC 01 BOX 2238 LAS MARIAS, PR 00670	06/29/18	17 BK 03566-LTS Employees Retirement System of the Government of the Commonwealth of Puerto Rico	152436	Undetermined*
Reason: Duplicate liability filed against Debtor Commonwealth of Puerto Rico.									
Surviving Claim # 152436 is on Omni 337 Claims To Be Reclassified from ERS to Commonwealth									

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Four Hundred Eighty-Seventh Omnibus Objection

Exhibit A - Claims to Be Disallowed

CLAIMS TO BE DISALLOWEDREMAINING CLAIMS

NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
17 ROLON ORTEGA, CARMEN M BO MOSQUITO PDA 6 BUZON 1525 AGUIRRE, PR 00704	06/04/18	17 BK 03283-LTS Commonwealth of Puerto Rico	51735	Undetermined*	ROLON ORTEGA, CARMEN M BO MOSQUITO PDA 6 BUZON 1525 AGUIRRE, PR 00704	06/04/18	17 BK 03566-LTS Employees Retirement System of the Government of the Commonwealth of Puerto Rico	37567	Undetermined*
Reason: Duplicate liability filed against Debtor Commonwealth of Puerto Rico.									
Surviving Claim # 37567 is on Omni 337 Claims To Be Reclassified from ERS to Commonwealth									
18 ROLON ORTEGA, CARMEN M. BO MOSQUITO POLA 6 BZN - 1525 AGUIRE, PR 00704	06/04/18	17 BK 03283-LTS Commonwealth of Puerto Rico	38583	Undetermined*	ROLON ORTEGA, CARMEN M BO MOSQUITO PDA 6 BUZON 1525 AGUIRE, PR 00704	06/04/18	17 BK 03566-LTS Employees Retirement System of the Government of the Commonwealth of Puerto Rico	37567	Undetermined*
Reason: Duplicate liability filed against Debtor Commonwealth of Puerto Rico.									
Surviving Claim # 37567 is on Omni 337 Claims To Be Reclassified from ERS to Commonwealth									
19 STELLA DIAZ, HIRAM A. PO BOX 40177 SAN JUAN, PR 00940-0177	05/24/18	17 BK 03567-LTS Puerto Rico Highways and Transportation Authority	34161	\$18,000.00*	STELLA DIAZ, HIRAM A. PO BOX 40177 SAN JUAN, PR 00940-0177	06/23/18	17 BK 03567-LTS Puerto Rico Highways and Transportation Authority	34168	\$34,380.00*
Reason: Duplicate liability filed against Debtor Commonwealth of Puerto Rico. All asserted liabilities, if any would be between the Claimant and the Puerto Rico Highways and Transportation Authority.									
20 STELLA DIAZ, HIRAM A. PO BOX 40177 SAN JUAN, PR 00940-0177	06/23/18	17 BK 03567-LTS Puerto Rico Highways and Transportation Authority	66117	\$34,380.00*	STELLA DIAZ, HIRAM A. PO BOX 40177 SAN JUAN, PR 00940-0177	06/23/18	17 BK 03567-LTS Puerto Rico Highways and Transportation Authority	34168	\$34,380.00*
Reason: Duplicate liability filed against Debtor Commonwealth of Puerto Rico. All asserted liabilities, if any would be between the Claimant and the Puerto Rico Highways and Transportation Authority.									
21 TORRES, LESLIE M HC 1 BOX 12591 PENUELAS, PR 00624	06/29/18	17 BK 03283-LTS Commonwealth of Puerto Rico	151833-1	Undetermined*	TORRES, LESLIE M. HC 1 BOX 12591 PENUELAS, PR 00624	06/29/18	17 BK 03567-LTS Puerto Rico Highways and Transportation Authority	138393-1	Undetermined*
Reason: Duplicate liability filed against Debtor Commonwealth of Puerto Rico. All asserted liabilities, if any would be between the Claimant and the Puerto Rico Highways and Transportation Authority.									

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Four Hundred Eighty-Seventh Omnibus Objection

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CLAIMS TO BE DISALLOWEDREMAINING CLAIMS

	NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT		NAME	DATE FILED	CASE NUMBER / DEBTOR	CLAIM #	CLAIM AMOUNT
22	TORRES, LESLIE M. HC 1 BOX 12591 PENUELAS, PR 00624	06/29/18	17 BK 03283-LTS Commonwealth of Puerto Rico	140140	Undetermined*		TORRES, LESLIE M. HC 1 BOX 12591 PENUELAS, PR 00624	06/29/18	17 BK 03567-LTS Puerto Rico Highways and Transportation Authority	138393	Undetermined*
							TORRES, LESLIE M. HC 1 BOX 12591 PENUELAS, PR 00624	06/29/18	17 BK 03567-LTS Puerto Rico Highways and Transportation Authority	138393-1	Undetermined*
Reason: Duplicate liability filed against Debtor Commonwealth of Puerto Rico. All asserted liabilities, if any would be between the Claimant and the Puerto Rico Highways and Transportation Authority.											
23	VAZQUEZ RIVERA, CARLOS I HC 73 BOX 4715 NARANJITO, PR 00719	03/16/18	17 BK 03567-LTS Puerto Rico Highways and Transportation Authority	3007	Undetermined*		VAZQUEZ RIVERA, CARLOS I HC 73 BOX 4715 NARANJITO, PR 00719-9607	03/16/18	17 BK 03567-LTS Puerto Rico Highways and Transportation Authority	3001	\$70,000.00*
Reason: Duplicate liability filed against Debtor Commonwealth of Puerto Rico. All asserted liabilities, if any would be between the Claimant and the Puerto Rico Highways and Transportation Authority.											